

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

No.: 6:24-cv-00306

**PROPOSED INTERVENOR DEFENDANTS' MOTION
FOR LEAVE TO FILE EXCESS PAGES**

Proposed Intervenor Defendants respectfully request that the Court extend the page limitation for their Motion to Intervene from 15 pages to 25 pages. The additional pages are necessary to fully address the important and material issues before the Court.

A proposed order is attached.

Dated: October 22, 2024

Respectfully submitted,

Paige Austin*

New York Bar No. 5246954
paige.austin@maketheroadny.org

/s/ Harold A. Solis

Harold A. Solis*

New York Bar No. 5122726
Harold.Solis@maketheroadny.org

MAKE THE ROAD NEW YORK
301 Grove Street
Brooklyn, NY 11237
Telephone: (718) 418-7690
Facsimile: (866) 420-9169

** admitted pro hac vice*

Esther H. Sung* (Lead Attorney)

California Bar No. 255962
esther.sung@justiceactioncenter.org

Karen C. Tumlin*

California Bar No. 234961
karen.tumlin@justiceactioncenter.org

Hillary Li*

Georgia Bar No. 898375
hillary.li@justiceactioncenter.org

Laura Flores-Perilla*

California Bar No. 355645
laura.flores-perilla@justiceactioncenter.org

Brandon Galli-Graves*

Texas Bar No. 24132050
brandon.galli-graves@justiceactioncenter.org

JUSTICE ACTION CENTER
P.O. Box 27280
Los Angeles, CA 90027
Telephone: (323) 450-7272
Facsimile: (323) 450-7276

Counsel for Proposed Intervenor Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2024, I electronically filed this motion with the Clerk of the Court for the United States District Court for the Eastern District of Texas by using the CM/ECF system. Counsel in this case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

/s/ Harold A. Solis

Harold A. Solis

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Proposed Intervenor have complied with the meet and confer requirements of Local Rule CV-7(h). On October 22, 2024, counsel for Proposed Intervenor—Harold A. Solis—conferred with counsel for Defendants—Erez Reuveni—by telephone about the relief requested in this motion. Defendants do not oppose this motion. On October 22, 2024, counsel for Proposed Intervenor—Harold A. Solis—conferred with counsel for Plaintiffs—Ryan Walters and Alan Hurst—by videoconference about the relief requested in this motion. Plaintiffs oppose this motion. Pursuant to Local Rule CV-7(i), discussions have conclusively ended at an impasse, leaving an open issue for the Court to decide.

/s/ Harold A. Solis

Harold A. Solis